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INSPECTION REPORT

for

RCRA Subtitle C

at

SMITHSONIAN INSTITUTION AIR & SPACE MUSEUM
UDVAR-HAZY CENTER

14390 Air & Space Museum Pkwy.,

Chantilly, VA 20151

VAR000507350
Conditionally Exempt Small Quantity Generator

Inspection Date

December 3, 2008

Michael K. Prescott
EPA Subcontractor to ERG
December 9, 2008

Smithsonian Institution Air & Space Museum Udvar-Hazy Center
Chantilly, VA 20151
December 3, 2008

VAR000507350

Inspector: Michael K. Prescott, Senior Engineer, EPA Subcontractor to ERG, 703-373-3811

VADEQ Inspectors: Richard Doucette, Waste Program Manager, 703-583-3813
Joe Trocchio, Waste Program Technician, 703-583-3844

Facility Representatives: Rick Cochran, Museum Facilities Manager, 703-572-4081
Mickey Lanigan, Environmental Protection Specialist, 202-633-3502

BACKGROUND

According to Mr. Cochran, the Smithsonian Institution Air & Space Museum Udvar-Hazy Center just celebrated their fifth anniversary and their initial notification five years ago was classified as a conditionally exempt small quantity generator (CESQG) of hazardous waste. Mr. Cochran reported the facility is a large aircraft display center and they have no labs, restoration, or vehicle maintenance activities at this location. Mr. Cochran reported restoration activities currently occur at a facility in Maryland, but they will soon begin construction of an on-site restoration facility. The purpose of the inspection was to evaluate the facility's compliance with the Resource Conservation and Recovery Act (RCRA). The facility was given advance notice of the inspection by EPA Region 3 about three business days before the site visit.

OPENING CONFERENCE

I entered the facility just before 10:30 AM and proceeded to a conference room with Mr. Cochran and Ms. Lanigan and discussed the purpose of the inspection. Richard Doucette and Joe Trocchio of the Virginia Department of Environmental Quality were also present for the inspection. Mr. Cochran works at the facility and Ms. Lanigan provides assistance and oversight to all the Smithsonian facilities. I also interviewed Mr. Cochran and Ms. Lanigan regarding the presence of any underground storage tanks (USTs) and they reported there were no USTs at the facility and I did not observe any evidence of USTs.

WASTE GENERATION

According to Mr. Cochran, the facility primarily generates waste paints, waste oils, and spent fluorescent lamps and does not generate any acute hazardous wastes. Mr. Cochran reported that they ship out hazardous wastes as needed and have not generated much hazardous wastes in the past five years since they began operations. Review of manifests for the past two years indicated the facility was a CESQG of hazardous wastes and that most of the hazardous wastes were from contractor projects on-site.

OBSERVATIONS

According to Mr. Cochran, the facility has no central waste storage area because they do not typically generate hazardous wastes. I did visit the Boiler and Chiller Plants, Restoration Barn, and Main Electrical Room where spent fluorescent lamps were stored and these areas are listed below followed by relevant observations. The tour of the facility was led by Mr. Cochran and Ms. Lanigan. Pictures taken during the site visit are referenced below and attached to this report (see Attachment 1) in the chronological order they were taken.

BOILER AND CHILLER PLANTS – In the Boiler and Chiller Plants, I did not observe any hazardous wastes, but I did find a gallon container of epoxy in a trash barrel (see Photo 1). Upon review of the Material Safety Data Sheet (MSDS), I determined the epoxy in the container would not be a hazardous waste upon disposal. In addition, I observed two 10,000-gallon diesel fuel aboveground storage tanks behind the Boiler Plant (see Photo 3) for backup fuel for the boilers, and two emergency generators with integrated diesel tanks in them.

RESTORATION BARN – This area, away from the main building, is used for equipment and materials storage, but no restoration activities or hazardous waste were observed in the building or surrounding area.

MAIN ELECTRICAL ROOM – In this area, I observed one spent fluorescent lamp stored in an unlabeled open box without an accumulation start date (see Photo 2).

RECORDS REVIEW

Before the facility tour, I reviewed manifests and LDR forms for the past three years and identified two shipments that contained more than 220 pounds of hazardous wastes (e.g., a December 2007 shipment had 475 pounds and the previous shipment in June 2007 had 400 pounds). Ms. Lanigan reported that the wastes in these shipments were generated over several months and not just the month they were shipped.

EXIT CONFERENCE

A brief exit conference was held with Mr. Cochran and Ms. Lanigan and the primary concern discussed was that they needed to track all contractor wastes generated by the facility to ensure they accurately classify their hazardous waste generator status and comply with the applicable regulations. In addition, the facility should properly manage spent fluorescent lamps as universal wastes in case they do exceed the CESQG waste generation threshold.

ATTACHMENT

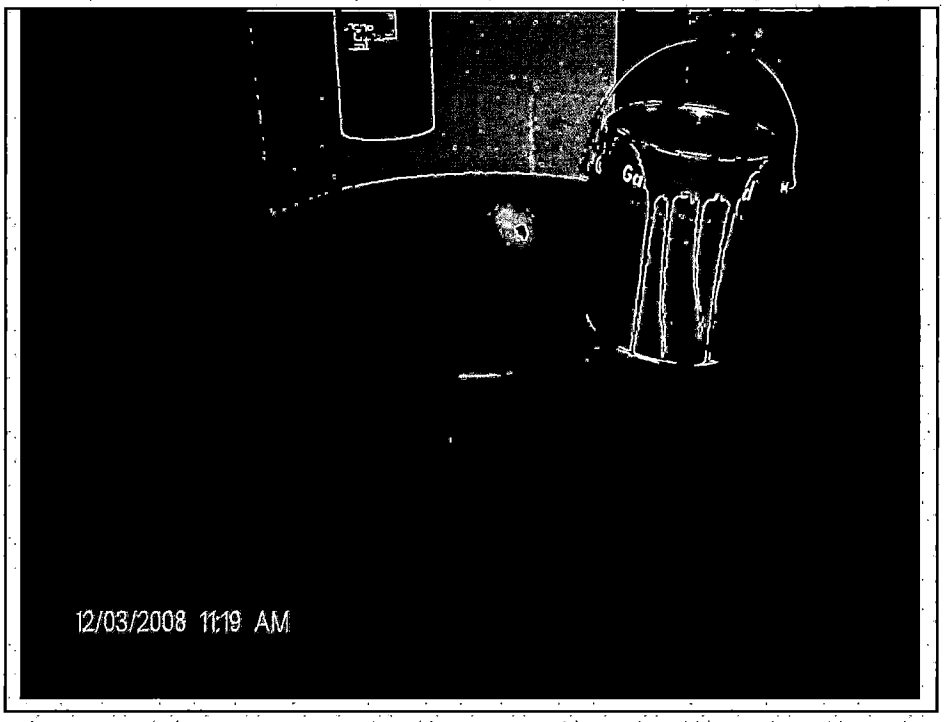
Attachment 1. Photo Log

ATTACHMENT 1. PHOTO LOG

SMITHSONIAN INSTITUTION MUSEUM
AIR & SPACE UDVAR-HAZY CENTER
RCRA PHOTO LOG

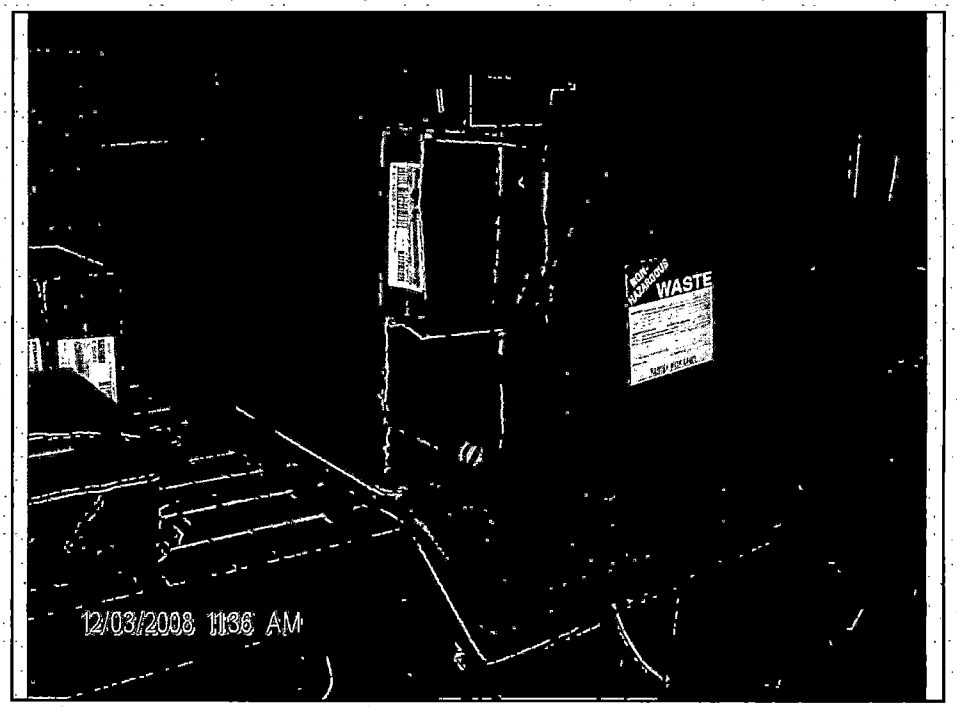
DATE TAKEN: 12/3/08
TAKEN BY: M. Prescott
PHOTO #: 1
COMMENTS: Container of waste epoxy that was observed in the trash (the MSDS was reviewed for the epoxy and it would not be a hazardous waste upon disposal).

SITE LOCATION: Boiler Plant



DATE TAKEN: 12/3/08
TAKEN BY: M. Prescott
PHOTO #: 2
COMMENTS: One spent fluorescent lamp in an open and unlabeled box.

SITE LOCATION: Main Electrical Room



SMITHSONIAN INSTITUTION MUSEUM
AIR & SPACE UDVAR-HAZY CENTER
RCRA PHOTO LOG

DATE TAKEN: 12/3/08
TAKEN BY: M. Prescott
PHOTO #: 3
COMMENTS: Two 10,000-gallon diesel fuel tanks.

SITE LOCATION: Behind the Boiler Plant